UNITED STATES OF AMERICA BEFORE THE NATIONAL LABOR RELATIONS BOARD

BRUSCO TUG AND BARGE CO.

and

Case 19-RC-13872

INTERNATIONAL ORGANIZATION OF MASTERS, MATES & PILOTS, PACIFIC MARITIME REGION, AFL-CIO

PETITIONER'S MOTION FOR EXTENSION OF TIME IN WHICH TO FILE OPPOSITION TO EMPLOYER'S REQUEST FOR REVIEW

The International Organization of Masters, Mates, & Pilots, ILA, AFL-CIO, hereinafter referred to as the Petitioner or the Union, files this Petitioner's Motion for Extension of Time In Which to File Opposition to Request for Review in this matter, and in support thereof avers as follows:

- 1. On December 21, 2006, the Regional Director for Region 19 issued a Second Supplemental Decision on Remand in this matter.
- 2. On information and belief, the Employer on or about January 3, 2007, filed with the Board a Request for Review.
- 3. The Employer's Request for Review was not properly served on the Petitioner's counsel, and Petitioner's counsel did not receive a copy of the Employer's Request for Review until yesterday, January 10, 2007.¹

¹ The Employer's Certificate of Service reveals that the attempted service to the undersigned counsel was sent to Albertini, Singleton, Gendler & Darby, LLP, a law firm that no longer exists. Moreover, the address to which it was sent – 3201 North Charles Street, Suite 1A, Baltimore, Maryland 21218 was never Petitioner's counsel address of record in this matter. Petitioner's counsel correct address appears in Petitioner's brief to the Regional Director on Remand and on all correspondence between the time the matter was remanded to the Region and the Regional Director's Decision.

4. Counsel for the Employer, Thomas M. Triplett, Esquire, has indicated that he does not object to the request for extension of time.

WHEREFORE, Petitioner respectfully requests an extension of time of seven (7) days from the time it received the Employer's Request for Review (January 10, 2007) in which to file an opposition to the Employer's Request for Review.

Respectfully submitted this 11th day of January of 2007.

Gabriel A. Terrasa John M. Singleton Singleton, Gendler & Terrasa 400 Redland Court, Suite 107 Owings Mills, Maryland 21117 (410) 902-0073

Counsel for the Petitioner

Certificate of Service

The undersigned counsel for the Union certifies that on this 11th day of January of 2007, a copy of the foregoing Petitioner's Motion for Extension of Time in Which to File Opposition to Employer's Request for Review has been served via first class mail on the following parties at the addresses shown below:

Karen O'Kasey, Esquire Thomas M. Triplett, Esquire Counsel for the Employer Schwabe, Williamson & Wyatt 1211 S.W. Fifth Ave., Suite 1600 Portland, Oregon 97204

> Gabriel A. Terrasa, Counsel for the Petitioner Singleton, Gendler & Terrasa 400 Redland Court, Suite 107 Owings Mills, Maryland 21117 (410) 902-0073